



The Law Office of Kevin J. Keating, P.C.
666 Old Country Road, Suite 900
Garden City, NY 11530
516-222-1099 • 212-964-2702
kevin@kevinkeatinglaw.com
Garden City • Manhattan

August 4, 2022

Via ECF

Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: United States v. Smookler
20-CR-00306-NGG-4**

Dear Judge Garaufis:

As Your Honor is aware, I represent Francis Smookler. I write, with the consent of the Government, to respectfully request a temporary modification of Smookler's conditions of release.

Smookler was originally arraigned in this matter on August 18, 2020, and released on a secured bond, which included customary travel restrictions limiting his movement to the Eastern and Southern Districts of New York. To date, Smookler has been fully compliant with the terms of his release.

I write to request a temporary modification of these conditions so as to allow Smookler to travel to Atlantic City, New Jersey with his wife. If permitted, Smookler would leave his New York residence on August 5, 2022, and travel to Atlantic City by car, and return home on Sunday, August 7, 2022.

As noted, I have conferred with AUSA Danielle Kudla, and Pretrial Services Officer, Mallori Brady, who offer their consent to this application.

Thank you for your consideration.

Very truly yours,

Kevin J. Keating

KEVIN J. KEATING

KJK/dg

cc: AUSA Danielle Kudla
Officer Mallori Brady

**Application granted.
So Ordered.**

s/Nicholas G. Garaufis
Hon. Nicholas G. Garaufis

Date: 8/4/22